

San Juan County



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BLM - UT - 950

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SAN JUAN COUNTY COMMISSION

Bruce B. Adams - Chairman
Kenneth Maryboy - Vice-Chairman
Phil Lyman - Commissioner
Rick M. Bailey - Administrator

October 17, 2011

Utah State Office
Bureau of Land Management
P.O. Box 45155
Salt Lake City, Utah 84145-0155

ATTN: Don Ogaard

RE: February 2012 Oil and Gas Lease Sale

Dear Mr. Ogaard:

We have reviewed Environmental Assessment DOI-BLM-UT-9100-2011-0005 and concur with the Finding of No Significant Impact. We offer the following comments on the environmental assessment for those parcels offered for lease in San Juan County.

Parcel UT0212-028: We question the attachment of stipulation UT-S-224 (Timing Limitation-Pronghorn Fawning Grounds) to this parcel. The Moab Resource Management Plan (RMP) does not include this area within pronghorn habitat and the area is not pronghorn habitat. Inclusion of this stipulation appears to be an error.

Parcel UT0212-032: This parcel includes stipulation UT-S-229 (Timing Limitation-Crucial Deer and Elk Winter Range) which appears to be an error. The Monticello RMP does not include this area as either crucial deer or elk winter range and the area is neither.

Other management prescriptions developed for leasing in the respective RMPs for the Moab and Monticello Field Offices will adequately protect those resources and concerns specific to the parcels in San Juan County. Sale of these parcels for oil and gas leasing would be consistent with San Juan County's Master Plan objective for minerals management. This objective states that lands with mineral potential should be open to oil and gas leasing with stipulations to protect the lands against unreasonable and irreparable damage to other significant resource values. It is the County's desire that these parcels be offered for sale in accordance with management prescriptions in the respective RMPs.

We appreciate the opportunity to review these documents and comment on actions that affect lands in San Juan County.

Sincerely,

Bruce B. Adams
Commission Chairman

cc: Tom Heinlein, Acting District Manager, Moab